

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**- against -**

**TELEGRAM GROUP INC. and TON ISSUER INC.**

**Defendants.**  
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**19 Civ. 09439 (PKC)**

**ECF Case**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for Non-Party [REDACTED] (identified as “Investor I”),<sup>1</sup> a private, non-governmental party, certifies that no publicly traded company owns more than a 10% share of Investor I.

Dated: February 4, 2020

Respectfully submitted,

*s/ Andrew Escobar*

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<sup>1</sup> The SEC previously filed a motion requesting an Order to file under seal and in redacted form on ECF materials reflecting the names and other identifying information of Gram purchasers, including non-parties the SEC identified as Investors A through H. (See SEC’s Mot. to Seal, ECF No. 28 (Oct. 23, 2019); Decl. of Ladan Stewart in Support of SEC’s Mot. for Sum. Judg., ECF No. 81 (Jan. 15, 2020).). This document continues to redact that identifying information, using the pseudonym “Investor I” for the Court’s convenience and to avoid confusion.